

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	§	
<i>Plaintiffs,</i>	§	
	§	
<i>v.</i>	§	
	§	Case No. 5:21-cv-844-XR
GREGORY W. ABBOTT, et al.,	§	
<i>Defendants.</i>	§	
	§	
<hr/>		
UNITED STATES OF AMERICA,	§	
<i>Plaintiff,</i>	§	
	§	
<i>v.</i>	§	Case No. 5:21-cv-1085-XR
	§	
THE STATE OF TEXAS, et al.,	§	
<i>Defendants.</i>	§	

EXHIBIT C

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,
Defendants.

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Case No. 5:21-cv-844-XR

UNITED STATES OF AMERICA,
Plaintiff,

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THE STATE OF TEXAS, ET AL.,
Defendants

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Case No. 5:21-cv-1085-XR

DECLARATION OF JOHN CRAWFORD

My name is John Crawford, and I am over the age of 18 and fully competent in all respects to make this declaration. I have personal knowledge and expertise of the matters herein stated.

1. I am the manager of Licensing Services Applications for the Texas Department of Public Safety (“DPS”). In this capacity, I manage a team of software developers who support licensing applications.

2. In this role, I have overseen the extraction of data from the DPS Driver License System (DLS) database on several occasions, including the most recent effort that was undertaken from December 2021 to January 2022 pursuant to the United States’ First Request for Production.

3. In extracting the data requested by the United States, our technical experts first had to develop a “requirements document.” This first step involves defining the data elements to be included, identifying the tables in which those elements reside, and defining the rules for extraction.

4. The requirements document then had to be reviewed and approved by DPS's Driver License Division. Multiple teams from the DPS's Information Technology Division including Application Development and Quality Assurance teams then had to review the requirements document to ensure its accuracy.

5. After this approval process was completed, my Application Development team then had to create and review the code that would be used to extract the data.

6. My team then had to execute the code to generate a test file. We had to ensure that test contents matched the requirements. Once we had confirmation that the contents matched, we then had to use those test results to estimate the amount of time that would be required to accomplish the full production extraction.

7. Following scheduling, the next step was to do the actual production extraction. The extraction itself took approximately 2.5 hours.

8. My team then had to verify the accuracy and completeness of the extracted data. Once verified, the encrypted data was transferred to the selected media for delivery.

9. In all, from the first step of the process described until the last, the extraction that was accomplished pursuant to the United States' First Request for Production took approximately four weeks.

10. The process described above required the multiple employees involved in the process to stop working on other important agency projects and initiatives. Producing the database extracts that the United States demanded was a time-consuming and resource-intensive process.

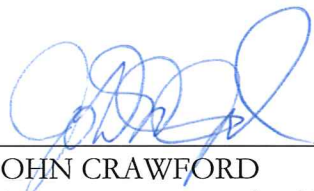
11. Producing extracts of the three additional fields that I understand the United States is now requesting—the "Card Status" field, "Surrendered DL/ID Number" field, and "License Surrendered" field—would require my team to repeat this extraction process. Providing the three new fields would require the modification of the code created for the original extract. Because the

DLS database is constantly being updated, the new data extract would need to contain the three new fields as well as updated data from all the fields produced in the first extraction. It is not possible to produce the three new fields as they existed at the time of the original extract.

12. All of the facts and information contained within this declaration are within my personal knowledge and are true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of February 2022.



JOHN CRAWFORD
Texas Department of Public Safety
Information Technology Division
Manager, License Servicing Applications